

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

PACE LOCAL UNION 5-1967 : Case No. C-1-01 301
et al. (WEBER, JUDGE)
Plaintiffs : (Magistrate Judge Novotny)

vs.

INTERNATIONAL PAPER COMPANY : PLAINTIFF'S REQUEST NOT TO FILE
ELECTRONICALLY

Defendant

Plaintiffs by their counsel request not to file electronically their January 15, 2004, filing of objections to the Magistrate's Report and Recommendation that Defendant's Motion for Summary Judgment be Granted and that their paper filing be accepted.

MEMORANDUM

Plaintiffs secured (by paper filing a motion for same on January 6, 2004) an extension of time to file their objections to the Magistrate's Report to January 23, 2004, and made a paper filing of our objections on January 15, 2004, unaware of the Court's new policies on electronic filing.

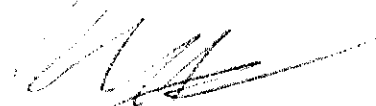
We had attached documents to our 1/15/04 objections, which however were the identical documents attached to our Memorandum Contra Defendant's Motion for Summary Judgment which we filed by paper on June 9, 2003. We were informed by the Judge's office yesterday afternoon of the electronic filing requirement.

My wife (who is my secretary) and I are paid up for a Delta flight to Ft. Myers, FL, at 9:45 a.m. tomorrow morning 1/17/04, returning 1/24/04, and I do not have time left to secure a password on the Court's web site and to file our objections electronically. I have never learned to use a scanner and my scanner was

disconnected from my computer when we were required to move my office 12/29/03. My present plan is (1) to send by E-Mail a duplicate of my objections (without the duplicated documents already file 6/9/03) upon my return and securing access to the Electronic Filing Policies; (2) either have a technician hook up my scanner, learn to use it or secure this to be done (e.g. by co-counsel I am engaging at Freking & Betz), in the event I need to file scanned documents in the future,

I request that the objections paper filed January 15, 2004, be accepted as such.

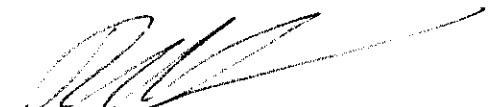
Respectfully submitted,



Robert I. Doggett (0016849)
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CERTIFICATE OF SERVICE

The undersigned attorney for Plaintiffs certifies that he served a copy of the above document upon Michael A. Roberts, attorney for Defendant, Graydon, Head & Richey, P.O. Box 6464, Cincinnati, Ohio 45210-6464, FAX 513-651-3836; and upon Vincent J. Miraglia, Esq. and W. Carter Younger, Esq., McGuire Woods, 1050 Connecticut Avenue, N.W., Washington, DC 20036-5317, FAX 202-857-1737, co-counsel for Defendant, by FAX this 16th day of January, 2004.



Robert I. Doggett (0016849)